

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Craig Casler, as Trustee for the
Heirs and Next-of-Kin of Abby
Rudolph, deceased,

Case No. 0:18-cv-01020 (WMW/LIB)

Plaintiff,

vs.

Clay County, *et al.*,

Defendants.

NOTICE OF APPEAL

Pursuant to Fed. R. App. P. 3(c)(1) and 4(a), and 28 U.S.C. § 1291, notice is hereby given that Defendants in the above-named case, Deborah Benson, Jana Bartness, Anthony Hanson, Cassie Olson, Devin Lien, and Lucas Heck (“Defendants”), appeal to the United States Court of Appeals for the Eighth Circuit. Defendants appeal from the Order¹ of the U.S. District Court for the

¹ Order Adopting Report and Recommendation and Granting in part and Den. in part Defs.’ Mot. for Summ. J., November 24, 2020, ECF No. 93.

District of Minnesota entered on November 24, 2020, denying Defendants qualified immunity because the facts² established Defendants' conduct:

1. Violated clearly established law; and,
2. Violated the Fourteenth Amendment to the Constitution.

Defendants' appeal turns on the foregoing legal issues.

Dated: December 24, 2020

By s/ Andrew A. Wolf

Jason M. Hiveley, #311546

Andrew A. Wolf, #398589

Iverson Reuvers

9321 Ensign Avenue South

Bloomington, MN 55438

jasonh@irc-law.com

andrew@irc-law.com

(952) 548-7200

Attorneys for Defendants

² Including the facts the district court specifically found adequately supported, and those it likely assumed by viewing the record in the light most favorable to Plaintiff unless blatantly contradicted by the record.